UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 6TH AVENUE
SEATTLE, WASHINGTON 98101

DATE:	See date of Section Chief signature
SUBJECT:	CLEAN AIR ACT VIRTUAL INSPECTION REPORT Waste Connections Wasco County Landfill, The Dalles, WA
FROM:	Daniel Heins, Environmental Scientist Air Toxics Enforcement Section, EPA Region 10
THRU:	Derrick Terada, Acting Section Chief Air Toxics Enforcement Section, EPA Region 10
TO:	File

BASIC INFORMATION

Facility Name: Waste Connections Wasco County Landfill

Facility Location: 2550 Steele Road, The Dalles, OR 97058

Date of Virtual Inspection: May 9, 2022

EPA Inspector(s):
1. Daniel Heins, Environmental Scientist
2. Brendan Whyte, Air and TRI Compliance Officer

Other Attendees:
1. Brian Evola, District Manager – Waste Connections
2. Nancy Mitchell, Site Manager – Waste Connections
3. Yuta Naganuma, Regional Engineer – Waste Connections
4. Jeremy Fink, Assistant District Manager – Waste Connections
5. Angie Tomlinson, Environmental Manager – Waste Connections
6. Jeffrey Leadford, Environmental Consultant – SCS Engineers
7. Ted Massert, Environmental Consultant – SCS Engineers
8. Walt West, Permit Writer/Inspector – Oregon Department of Environmental Quality (ODEQ)
9. Anna Loyd, Permit Writer/Inspector – ODEQ

Contact Email Address: yuta.naganuma@wasteconnections.com

Facility Type: Muncipal solid waste (MSW) landfill

Regulations Central to Inspection: 40 C.F.R. Part 60, Subpart WWW; Oregon State Plan for Part 60 Subpart Cf; Part 63 Subpart AAAA, Part 98 Subpart HH

Virtual Conference Start Time: 09:00
Virtual Conference End Time: 10:00

Inspection Type:
☐ Unannounced Inspection
☒ Announced Inspection

EPA notified Brian Evola and Nancy Mitchell of the planned virtual inspection via email on April 29, 2022, requesting arrangement of a mutually agreeable inspection time and date. EPA stated that the inspection would focus on the facility operations, air emissions, and emissions controls, with particular focus on the gas collection and control system (GCCS) the facility is implementing, waste types/quantities received at the landfill, and details on the non-methane organic compound (NMOC) reports that triggered the applicability of GCCS requirements.

The inspection was conducted via Microsoft Teams teleconference.

CONFERENCE

☒ Presented Credentials
☒ Stated authority and purpose of inspection
☐ Provided Small Business Resource Information Sheet
☒ Small Business Resource Information Sheet not provided. Reason: Not a small business
☒ Provided CBI warning to facility

Unless otherwise stated, the following information was obtained verbally from Waste Connections representatives and their consultants.

Company Ownership:
Waste Connections has owned and operated the Wasco County Landfill since 1999.

Process Description:
The Wasco County Landfill (the Landfill) is a municipal solid waste landfill located in The Dalles, Oregon. Waste Connections has 18 employees at the Landfill. The Landfill is permitted for 170 acres and a roughly 36 million megagram (Mg) design capacity, of which 75 acres have been constructed with approximately 6 million tons of waste in place. The Landfill began accepting waste in the 1950s, and currently is projected to be accepting waste through 2066. Phase 1 of the Landfill is pre-Resource Conservation and Recovery Act (RCRA) and unlined, while the rest of the Landfill is lined and operated according to RCRA Subtitle D requirements. Final cover is in place on Phase 1. Intermediate cover consists of 18 to 24 inches of dirt. Auto fluff and contaminated soils (petroleum and otherwise) are each used as alternative daily cover

(ADC). The Landfill receives approximately one million tons of waste per year, inclusive of ADC. This includes both MSW and a variety of other Subtitle D wastes. Liquid wastes are solidified before being deposited at the Landfill. All leachate collected is recirculated back into the Landfill.

The Landfill was operating under Part 60 Subpart WWW until the Oregon State Plan implementing Part 60 Subpart Cf became effective. Waste Connections determined the Landfill would exceed the 50 Mg NMOC applicability threshold for Subpart WWW in 2019. This calculation relied on a site-specific NMOC value from Tier 2 testing conducted in 2016 and on the exclusion of nondegradable waste from the equation inputs. Waste Connections submitted a GCCS design plan to ODEQ. Waste Connections began GCCS construction in April 2022, and the system will be fully online and operating under the applicable requirements in July 2022. The system will include approximately 23 gas collection wells routed to an open flare. Prior to this construction, the Landfill had no landfill gas collection.

Records Review:
EPA asked to view the records of waste received by type for a recent year. Waste Connections displayed the waste tonnages for 2021 by type. EPA did not retain a copy but included this in the subsequent document request.

Roughly half of the waste deposited in 2021 was municipal solid waste. Auto shredder fluff, "Cleanup & MGT Fee/Soil", and industrial/special wastes each made up approximately 10% of waste. Waste Connections explained that the "Cleanup & MGT Fee/Soil" included soils, biosolids, and street sweepings. Waste Connections provided pulp/paper mill waste and waste from cherry orchards/other agricultural waste as examples of industrial/special wastes received. EPA asked if they received and tracked any inert or nondegradable industrial wastes received and Waste Connections did not identify any such wastes. Other wastes deposited included "residual" (clarified to be recycling residuals), ash, tires, asbestos, construction and demolition (C&D) waste, liquid, and both "high VOC" (volatile organic compound) and "low VOC" petroleum contaminated soils. Waste Connections stated that it does not track C&D waste by subtype. EPA asked how high and low VOC petroleum contaminated soils are distinguished, and Waste Connections stated that there was a designated parts per million (ppm) threshold and that this would be an item for follow up.

EPA displayed the 2020 Greenhouse Gas Reporting Program data for the Landfill, accessible via the "Facility Level Information on GreenHouse gases Tool" website, establishing the reporting of inert wastes beginning in 2003.

Staff Interview:
EPA asked Waste Connections if it excluded any waste as nondegradable from the calculations of NMOC generation used to determine GCCS applicability and of maximum gas generation used in the GCCS Design Plan. Waste Connections stated that while they did exclude waste from these calculations, they were not prepared to say which wastes they classified as nondegradable for this purpose or when they started marking waste as nondegradable. Waste Connections stated that they could follow up on this.

EPA asked which wastes were classified as inert for the purpose of the Greenhouse Gas Reporting Program (Part 98). Waste Connections stated that they were not able to say which wastes they considered to be inert but that they had a reference document they used to classify the waste types (as seen in the 2021 data we reviewed).

EPA asked about the history of site-specific NMOC testing (Tier 2 tests) prior to the 2016 test, and Waste Connections indicated that this would need to be an item for follow up.

Compliance Assistance:
EPA noted that "nondegradable" for the landfill air rules under Part 60/62/63 is defined differently than the Part 98 definition for "inert", with the former saying any waste that can degrade and produce landfill gas is considered degradable, while the latter is concerned strictly with greenhouse gas generation. Gypsum wastes were provided as an example of an "inert" waste that is not "nondegradable."

EPA explained why the constants in the landfill gas generations equations and the Landfill Gas Emissions Model (LandGEM) for applicability purposes under Parts 60/62/63 are different from the constants in that model for emissions inventory purposes, noting the conservative nature of the former and the resulting allowance for site specific testing for some of the parameters.

EPA noted that NMOC reports and Design Plans frequently excluded nondegradable waste but provide no record of the nature and quantity of the excluded waste, and that this results in reports that are misleading and potentially result in compliance concerns.

Requested documents and follow up:

- GCCS Design Plan (and a site map if not included in Design Plan)
- 2016 Site Specific NMOC Test Report and all previous NMOC tests conducted on site
- Copy of the first NMOC report for WWW/AAAA using the 2016 NMOC value and any subsequent NMOC reports until applicability was established
- Annual number of gallons of leachate collected and recirculated (past 5 years)
- Annual waste deposited data by type from 2003 to present (or the year nondegradable wastes were excluded from the NMOC reports/Design Plan, if earlier than 2003)
- Outline of what wastes are classified as nondegradable for LandGEM runs for NMOC reports (CAA applicability) and maximum expected gas generation (Design Plan) along with the basis for this classification
- Outline of what wastes are classified as "inert" for Part 98 reporting along with the basis for this classification
- The ppm threshold for distinguishing the petroleum contaminated soils and a statement to how this is evaluated
- 2021 Part 98 Greenhouse Gas report

The document request was discussed at the closing of the conference and confirmed via follow up email the same day.

DIGITAL SIGNATURES

Heins, Daniel

Digitally signed by Heins, Daniel
Date: 2022.05.11 10:15:58 -04'00'

Daniel Heins, Report Author

DERRICK TERADA

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Date: 2022.05.11 09:43:09 -07'00'

Derrick Terada, Acting Section Chief